

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

July 19th 2023
By Ravi Subramanian, Clerk
[Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

1. FRANK LOZANO GRAVES,
2. FRANK MARQUIS GRAVES,
3. LOREN MICHAEL FITZGERALD,
4. MARQUISE LATRELLE TOLBERT, and
5. ADRIANNA KINSEY,
Defendants.

NO. **CR 23-118 TL**

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Conspiracy to Distribute Controlled Substances)

Beginning at a time unknown, and continuing until at least July 19, 2023, in King
County, within the Western District of Washington, and elsewhere, FRANK LOZANO
GRAVES, FRANK MARQUIS GRAVES, LOREN MICHAEL FITZGERALD,

MARQUISE LATRELLE TOLBERT, and ADRIANNA KINSEY, and others known and unknown, did knowingly and intentionally conspire to distribute oxycodone, a substance controlled under Title 21, United States Code.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 846.

COUNT 2

(Attempted Possession of Controlled Substances with Intent to Distribute)

(One package mailed to Adrianna Kinsey)

On or about June 2, 2023, in King County, within the Western District of Washington, and elsewhere, FRANK LOZANO GRAVES, FRANK MARQUIS GRAVES, and ADRIANNA KINSEY did knowingly and intentionally attempt to possess, with the intent to distribute, and aid and abet the possession of, with the intent to distribute, oxycodone, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 3

(Attempted Possession of Controlled Substances with Intent to Distribute)

(Two packages mailed to Adrianna Kinsey)

On or about June 20, 2023, in King County, within the Western District of Washington, and elsewhere, FRANK LOZANO GRAVES, FRANK MARQUIS GRAVES, and ADRIANNA KINSEY did knowingly and intentionally attempt to possess, with the intent to distribute, and aid and abet the possession of, with the intent to distribute, oxycodone, a substance controlled under Title 21, United States Code.

1 The Grand Jury further alleges that this offense was committed during and in
2 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
3 Substances).

4 All in violation of Title 21, United States Code, Sections 846, 841(a)(1) and
5 841(b)(1)(C) and Title 18, United States Code, Section 2.

6 **COUNT 4**

7 **(Possession of Controlled Substances with Intent to Distribute)**

8 **(Seizure from vehicle of Loren Michael Fitzgerald)**

9 On or about June 12, 2023, in King County, within the Western District of
10 Washington, and elsewhere, FRANK LOZANO GRAVES, FRANK MARQUIS
11 GRAVES, and LOREN MICHAEL FITZGERALD did knowingly and intentionally
12 possess, with the intent to distribute, and aid and abet the possession of, with the intent to
13 distribute, oxycodone and cocaine, substances controlled under Title 21, United States
14 Code.

15 The Grand Jury further alleges that this offense was committed during and in
16 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
17 Substances).

18 All in violation of Title 21, United States Code, Sections 841(a)(1) and
19 841(b)(1)(C) and Title 18, United States Code, Section 2.

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21 **FORFEITURE ALLEGATION**

22 The allegations contained in Count 1, 2, 3 and 4 of this Indictment are hereby
23 realleged and incorporated by reference for the purpose of alleging forfeiture. Upon
24 conviction of any of the offenses alleged in Counts 1, 2, 3 or 4, FRANK LOZANO
25 GRAVES, FRANK MARQUIS GRAVES, LOREN MICHAEL FITZGERALD,
26 MARQUISE LATRELLE TOLBERT, and ADRIANNA KINSEY shall forfeit to the
27 United States, pursuant to Title 21, United States Code, Section 853, any property that

1 constitutes or is traceable to proceeds of the offense, as well as any property that
2 facilitated the offense.

3 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
4 any act or omission of the defendants,

- 5 a. cannot be located upon the exercise of due diligence;
- 6 b. has been transferred or sold to, or deposited with, a third party;
- 7 c. has been placed beyond the jurisdiction of the Court;
- 8 d. has been substantially diminished in value; or
- 9 e. has been commingled with other property which cannot be divided
10 without difficulty,

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to
3 Title 21, United States Code, Section 853(p).

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5 A TRUE BILL:

6 DATED: 7/19/23

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8 *Signature of Foreperson redacted pursuant*
9 *to the policy of the Judicial Conference of*
10 *the United States.*

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FOREPERSON

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TESSA M. GORMAN
Acting United States Attorney

Max St. _____ for

VINCENT T. LOMBARDI
Assistant United States Attorney

STEPHEN HOBBS
Assistant United States Attorney

MICHELLE JENSEN
Assistant United States Attorney